

REMARKS

Applicant respectfully traverses and requests reconsideration.

§ 102 Rejections: Claims 16-19

Claims 16-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Number 6,943,667 to Kammer et. al. ("Kammer"). Kammer does not appear to teach or suggest, among other things, receiving an independent power supply to power a remote control or a remote connector that includes a plurality of ports each capable of receiving a peripheral component for communication with a processing system.

The Kammer Reference

Kammer is directed to a method and a system for data transmission between a trusted first electronic device and a second electronic device. In Kammer, the first electronic device transmits data signals and the second electronic device detects the transmitted signal. Transmission of data between the two devices occurs while a microprocessor in a second device is in a sleep mode and the wireless transceiver of the second device is in a wake mode. An interrupt signal is generated by a baseband processor in the transceiver of the second device to wake up the microprocessor in the second electronic device. (See Abstract, Column 2, Lines 1-52). More specifically, Kammer is directed to devices that may take the form of a transceiver circuit and a processing circuit. The transceiver circuit comprises an antennae, a baseband processor 270, and a communication port 260. When a remote device transmits a signal (see element 200 of Fig. 2) transceiver circuit 250 receives the signal and transmits it to the baseband processor 270 to determine if the signal is a connection attempt. The baseband processor 270 is coupled to the communication port 260 and determines: (a) if the communication port 260 is closed; and (b) if signal 201 is transmitted by a trusted device. (See Column 5, Line 62 -

Column 6, Line 18). The communication port 260 serves as an input/output port with a microprocessor.

If the communication port 260 is closed and signal 201 is from a trusted device, baseband processor 270 toggles an outside line 235 which causes a generation of an interrupt signal. The interrupt signal is then transmitted to microprocessor 220 via an interrupt line 240 which in turn causes a microprocessor 220 to wake up to its full operational capacity. Thereafter, a communication protocol is involved to cause the communication port 260 to open and receive data signal 201. If, however, port 260 was already open when the message was received, the interrupt signal is still generated to wake up microprocessor 220. Once awakened, it receives a message from the open port. (Column 6, Line 19 — 44). While Kammer appears to teach a communication port that may be open or closed, Kammer appears silent as to providing, by the remote connector, a plurality of ports each capable of receiving a peripheral component ... or receiving an independent power supply to power a remote connector.

Independent Claim

As to claim 16, Applicant has amended the claim to clarify that the method includes “receiving an independent power supply to power a remote connector” and “providing, by the remote connector, a plurality of ports each capable of receiving a peripheral connector for communication with a processing system.” (See, for example, Specification, page 14, paragraph 41 and elsewhere). The Advisory Action states that claim 16 (in addition to claim 10, discussed below) recites a new limitation that requires further search and consideration. The new limitation that allegedly requires further search and consideration is directed to receiving an independent power supply to power a remote connector. Without addressing the appropriateness of this statement, Applicants respectfully note that the neither the Final Action nor the Advisory

Action properly cite Kammer for teaching Applicant's claimed "providing, by the remote connector, a plurality of ports each capable of receiving a peripheral connector for communication with a processing system."

For instance, the Final Action states that said limitation is taught because element 210 (i.e., the device circuit comprising a microprocessor 220 and memory 230) is allegedly a peripheral circuit and because element 320 (i.e., the communication port 320) is capable of receiving the alleged connector 210. (Page 3). As previously stated in Applicant's remarks filed November 20, 2006, "The office action appears to confuse reference numbers and figure numbers in the rejection. For example, the office action refers to 210 as being a peripheral connector that connects to peripheral devices such as 105 and 106. However, 210 is not a connector but instead, as state in Kammer[,] is a 'device circuit 210'. Accordingly, Kammer does not teach what is alleged." (Pages 10-11). Applicant respectfully reasserts these points and kindly asks the Examiner to clarify how Kammer's device circuit 210 is equivalent to Applicant's claimed peripheral connector while transceiver 310 is also equivalent to Applicant's claimed peripheral device. Applicant notes that this position may not stand and that if the claims are not allowed, any future action sustaining this rejection should clarify the Office's position with respect to which device, component or feature in Kammer is allegedly equivalent to Applicant's claimed peripheral device and which device, component or feature is allegedly equivalent to Applicant's claimed remote connector.

Applicant further notes that the claimed subject matter requires "providing, by the remote connector, a plurality of ports, each capable of receiving a peripheral connector for communication with a processing system." Applicant notes that the device circuit 210 of Kammer cannot be a peripheral connector as suggested by the Office Action because Kammer

does not teach that the device circuit 210 is capable of communication with a processing system. At best the device circuit 210 is a processing system and the Kammer reference is silent as to any peripheral connector as claimed.

For these reasons and for those articulated in the response filed November 20, 2006, Applicant respectfully submits that claim 16 is in proper condition for allowance.

Dependent Claims

Claims 17 – 19 depend upon allowable claim 16 and are further believed to add additional novel and non-obvious subject matter. For the aforementioned reasons, claims 17 – 19 are also believed to be improper condition for allowance.

§ 103 Rejections: Claims 1-8 and 20-23

Claims 1–8 and 20–23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's admitted prior art in view of Kammer.

Independent claims

As to claim 1, Applicant has made an amendment to clarify that the remote connector comprises “a plurality of ports, each capable of receiving a peripheral component for communication with a processing unit.” For purposes of brevity, Applicant has not reprinted its previous remarks filed November 20, 2006 and has instead chosen to incorporate the same by reference. However, Applicant further notes that the entire basis used by the Advisory action in sustaining the instant rejection is faulty. The Advisory Action states that “Although not mentioned explicitly in Kammer et al, transceiver typically comprises [a] plurality of input ports for providing voltage, data. However, Applicant is unable to find any support for this contention and respectfully requests a showing specifically pointing out why Kammer's transceiver would typically comprise a plurality of ports, each of the plurality of ports capable of receiving a

peripheral component for communication with a processing unit. Because the Advisory Action relies on an improper motivation to combine references without support in any cited references, Applicant reasserts its previous argument: The Office appears to rely on impermissible hindsight analysis by selectively piecing disparate teachings from two different embodiments presented in Applicant's background (i.e., the wired hub and the remote device) with an unfounded assertion that stretches the scope of the cited prior art.

For at least these reasons, claims 1 and 21 are believed to be allowable over the cited prior art.

Dependent Claims

Claims 2-8, 20 and 22-23 are dependent upon allowable claims 1, 16 and 21, respectively. Applicant respectfully submits that the dependent claims add additional novel and non-obvious subject matter. For at least these reasons, the aforementioned claims are also believed to be in proper condition for allowance.

§ 103 Rejections: Claims 10 and 12-15

Claims 10 and 12-15 stand rejected as being unpatentable over Applicant's admission of prior art, in view of UK Patent Application Publication 0117150.3 to Wang et al ("Wang").

Independent Claim

As to claim 10, Applicant has made a variety of typographical amendments in addition to clarifying amendments similar to those presented in claim 16. Applicant respectfully reasserts the relevant remarks made above with respect to claim 16. As previously suggested by Applicant, Wang does not appear to be a properly enabled reference, and, in any event, does not appear to teach the limitations for which the previous actions allege Wang teaches or suggests. Additionally, Applicants reassert the relevant remarks made above with respect to claim 1 in that

the Office Action appears to use impermissible hindsight reconstruction in using Applicant's background as a blue print for combining the references

Turning to the claim limitation "a power supply input receiver operably coupled to an independent power source and being capable of receiving a power supply for powering the remote connector", Applicants respectfully submit that while the Office Action cites the WATCH DOG TIME OUT feature of Wang as teaching this feature, the Office Action also clarifies that the WATCH DOG TIME OUT feature is described as a feature that provides power to the sensor in a wireless USB peripheral device. The reference appears silent as to an independent power source ... for supplying power to the remote connector. Because the claimed remote connector includes, among other things, a power supply input receiver, a plurality of ports, a wireless receiver, a transmitter and an input/output port, Wang's recitation of a WATCH DOG TIME OUT feature for providing power to a sensor fails to read on Applicant's claimed subject matter. For this reason alone and because Applicant's allegedly admitted prior art does not teach this limitation, claim 10 appears to be in proper condition for allowance.

Applicant also notes that the Office Action cites Wang as teaching the claimed "an input/output port operably coupled to the processing unit, such that the wake-up command may be provided to the processing unit." However, Wang fails to teach providing any such wake-up command to a processing unit. Instead, Wang teaches that "if the sensor [of the wireless USB peripheral device] detects a signal, the computer system proceeds with REMOTE WAKE UP to wake up the wireless USB peripheral device. To the extent that Wang can be compared to Applicant's claimed subject matter, Wang's wireless USB peripheral device cannot be compared to Applicant's claimed processing unit as the current amendment makes clear that the claimed plurality of ports are "each capable of receiving a peripheral connector for communication with a

processing unit.” For this reason, Wang also does not teach what is alleged by the current Office Action.

Further and with respect to the improper motivation to combine Applicant’s allegedly admitted prior art employed by the Office Action to impermissibly reconstruct the claimed invention, Applicant respectfully notes that the Office Action does not cite Wang for teaching the claimed plurality of ports, each capable of receiving a peripheral connector for communication with a processing unit. Instead, the Office Action cites Applicant’s background as teaching this limitation. The Office Action further alleges that both Applicant’s background and Wang teach the claimed wireless receiver limitation. Assuming, for argument’s sake, that the citations are accurate, Applicant’s note that the motivation to combine references is faulty as the only suggestion in the cited prior art to combine the disparate teachings comes from Applicant’s disclosure.

Specifically, Applicant submits that its background teaches two separate prior art devices. The first is a USB hub that accepts multiple USB devices and allows connectivity with an external processing system. The second device is a remote control that employable by a user for issuing RF commands to a receiver that subsequently instructs a system coupled thereto based on the issued RF command. The two devices are separate and are not described as features of the same system.

The motivation to combine the references is allegedly that incorporation of “the teachings of Want [sic] et al into applicant’s [alleged] admission of prior art ... would allow the suspend and wake-up of wireless perimeter efficiently. The remote control of wireless perimeter’s wakeup of [sic] can take significant time and energy if not done properly.” (Page 12). Applicant first states that it is unable to ascertain what component of the Wang disclosure corresponds to

the wireless perimeter. Moreover, assuming that the wireless perimeter is the wireless USB peripheral device as described on page 6 of Wang, Applicant notes that this teaching is incompatible with Applicant's claim. Applicants claim a processing unit that receives a wake-up command and not the wake up of a wireless USB peripheral device. Accordingly, the only motivation to combine the two devices or, for that matter, the only motivation to combine the first device with Wang's remote receiver is Applicant's written disclosure. As articulated in the MPEP, hindsight analysis cannot play a role in articulating a motivation to combine references.

For at least the reasons stated above, claim 10 appears to be in proper condition for allowance.

Dependent Claims

Claims 12-15 are dependent upon allowable claims 10. Applicant respectfully submits that the dependent claims add additional novel and non-obvious subject matter. For at least these reasons, the aforementioned claims are also believed to be in proper condition for allowance.

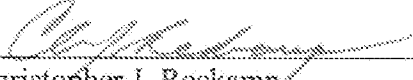
§ 103 Rejections: Claims 9 and 24

Claims 9 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's admitted prior art in view of Kammer and further in view of US Patent Publication No. 2002/0057892 to Mayo et al. Claims 9 and 24 are dependent upon allowable claims 1 and 21, respectively, and further add additional novel and non-obvious subject matter. For at least these reasons, claims 9 and 24 are believed to be allowable over the cited prior art.

Applicant respectfully submits that the claims are in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Date: 12-22-06

By: 
Christopher J. Reckamp
Registration No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.
222 North LaSalle Street, Suite 2600
Chicago, Illinois 60601
phone: (312) 609-7599
fax: (312) 609-5005